

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**In Re GRAND JURY SUBPOENA DUCES TECUM
DATED MARCH 26, 2018 RETURNABLE APRIL
10, 2018.**

Misc. Case No. 18-130 (KMW)

NOTICE OF MOTION

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SIR/MADAM:

PLEASE TAKE NOTICE that upon the annexed Declaration of Michael S. Pollok, an attorney duly admitted to practice law in the United States District Court for the Southern District of New York, the exhibits appended thereto, the accompanying Memorandum of Law, and upon all prior proceedings had herein, Kymara Lonergan, the recipient of the above-captioned Grand Jury Subpoena *Duces Tecum*, dated March 26, 2018, will move this Court at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York in courtroom 21B, before the Honorable Kimba M. Wood, United States District Court Judge, on April 10, 2018 at 12:30 p.m. or as soon as counsel may be heard, for an Order:

1. Quashing the above-captioned Grand Jury subpoena pursuant to Rule 17(c)(2) of the Federal Rules of Criminal Procedure (“Fed.R.Crim.P.”) and the Fourth Amendment to the United States Constitution; or
2. Quashing the above-captioned Grand Jury subpoena pursuant to the Fifth Amendment to the United States Constitution; or
3. Granting immunity to Kymara Lonergan at the government’s request pursuant to 18 U.S.C. §§ 6002, 6003; and

4. Granting a 30-day extension of time to respond to the subpoena if this motion to quash is denied or immunity is conferred; and

5. Granting such other and further relief that is just and appropriate.

Dated: New York, New York
April 5, 2018

Yours etc.,



Michael S. Pollok, Of Counsel
Kantor, Davidoff, Mandelker, Twomey, Gallanty
& Kokhba, P.C.

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To: Clerk of the Court

Honorable Kimba M. Wood
United States District Judge
For the Southern District of New York
United States Courthouse
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